

1 THE HONORABLE JOHN C. COUGHENOUR
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7 IN THE UNITED STATES DISTRICT COURT
8 FOR THE WESTERN DISTRICT OF WASHINGTON
9 AT SEATTLE

10 IN RE VALVE ANTITRUST
11 LITIGATION

12 CIVIL ACTION NO. 2:21-cv-00563-JCC

13 **DECLARATION OF BENJAMIN
14 GREENBERG IN SUPPORT OF
MOTION TO KEEP NON-PARTY
BEST BUY'S HIGHLY
CONFIDENTIAL – ATTORNEY'S
EYES-ONLY INFORMATION
UNDER SEAL**

15 I, Benjamin Greenberg, declare the following:

16 1. I am a Partner at the law firm Dorsey & Whitney LLP and counsel to Best Buy Co.,
17 Inc. ("Best Buy"). The facts stated in this declaration are based on my own personal knowledge,
18 and if called as a witness, I could and would testify to those facts.

19 2. I submit this declaration in support of Best Buy's motion to seal in the
20 above-captioned litigation.

21 3. I attest that the highlighted portions of the opening expert report of Dr. Steven
22 Schwartz, (Exhibit 1 to the Declaration of Alicia Cobb) (Dkt. # 182-1 – under seal) ("Schwartz
23 Report") in support of Plaintiffs' motion for class certification that is appended to the Declaration
24 of Ashley Pierson in Support of Motion to Keep Non-Party Best Buy's Highly Confidential –
25 Attorney's Eyes-Only Information Under Seal, contains information from documents that Best

1 Buy designated and produced as “Highly Confidential – Attorney’s Eyes-Only” during discovery.

2 4. I also attest that I telephonically met and conferred with Plaintiffs’ counsel to
3 discuss the sealing of the above-referenced information on March 27, 2024. I also conferred via
4 videoconference with Valve’s counsel on the same day.

5 5. Plaintiffs and Valve do not oppose Best Buy’s present motion to Keep Non-Party
6 Best Buy’s Highly Confidential – Attorney’s Eyes Only Information Under Seal.

7 I declare under penalty of perjury that the foregoing is true and correct.

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9 DATED this 20th day of June, 2024, at Seattle, Washington.

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11 /s/ Benjamin Greenberg
12 Benjamin Greenberg
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1 **CERTIFICATE OF SERVICE**

2 I certify under penalty of perjury that on June 20, 2024, I caused to be electronically filed
3 the foregoing document with the Clerk of the Court using the CM/ECF system, which will send a
4 notification of the filing to the email addresses indicated on the Court's Electronic Mail Notice
5 List.

6 Dated this 20th day of June, 2024.
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8 */s/ Hannah Richter*

9 Hannah Richter, Legal Assistant

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